

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ZHIJUN XIA,

Defendant.

4:20CR *BAMA* 3062

INDICTMENT

18 U.S.C. § 2251(a) and (e)

18 U.S.C. § 2422(b)

The Grand Jury charges that

COUNT I

Between on or about June 1, 2018 through on or about February 28, 2020, in the District of Nebraska and elsewhere, the defendant, ZHIJUN XIA, did knowingly employ, use, persuade, induce, entice and coerce minor Victim 1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and the visual depiction was transported in and affecting interstate commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT II

Beginning on or about July 9, 2018, through on or about July 11, 2018, in the District of Nebraska and elsewhere, the defendant, ZHIJUN XIA, did use any facility of interstate and foreign commerce, to knowingly persuade, induce, and entice an individual, to wit: Victim 1, who had not attained the age of 18 years to engage in sexual activity for which the defendant could be charged with a criminal offense, to wit: Sexual Assault on a Child in the First Degree in violation of Neb. Rev. Stat. § 28-319.01(1)(b) and 28-319.01(2).

In violation of Title 18, United States Code, Section 2422(b).

FILED  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA

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A TRUE BILL.

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FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.

*Sean P. Lynch*  
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SEAN P. LYNCH, #25275  
Assistant U.S. Attorney